

STATEMENT

Upstart Company (“Carrier”) has established operating procedures that ensure compliance with the Federal Communications Commission (Commission”) regulations regarding the protection of consumer proprietary network information (“CPNI”).

Carrier has implemented a system whereby the status of a customer’s CPNI approval can be determined prior to the use of CPNI.

Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.

Carrier maintains a record of its and its affiliates’ sales and marketing campaigns that use its customers’ CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.

Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier’s sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI.